

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff

vs.

ADRIONNA LEEPER,

Defendant.

8:22CR66

SENTENCING MEMORANDUM

**GOVERNMENT’S MEMORANDUM IN AID OF SENTENCING**

The United States of America, by and through Kimberly C. Bunjer, Assistant United States Attorney, respectfully submits this memorandum in aid of sentencing.

The parties are before the court for the sentencing of Leeper for Count I of the Indictment for Conspiracy to Interfere with Commerce by Robbery 18 U.S.C. X 1951(a). The plea agreement agrees to dismiss the remaining counts at sentencing. The parties agreed to an 11(c)1(c) agreement to a sentence not to exceed 93 months.

The Revised Presentence Investigation Report properly established the defendant’s sentencing guideline range as 135 months to 168 months. Since the agreement is “no more than 93 months,” if the court accepts the plea agreement, the highest the court can sentence is 93 months and this is what I am proposing. This defendant was involved in at least 16 robberies that involved violence, fear and no regard for innocent people working at these establishments. Leeper may not have been the individual brandishing the weapon, but she had numerous opportunities to disassociate herself from these crimes and/or even tell the authorities to stop these blatant robberies.

The United States disagrees with any variance and especially the recommendation by U.S. Probation. The defendant is already receiving a 42 month departure from the guidelines to a sentence of 93 months. The co-defendant, Quincy Louis and Leeper's boyfriend, received a sentence of 240 months. Leeper's sentence would still be less than half of her co-defendant's at 93 months. Her role and position in the conspiracy is closer to Quincy Louis' than any of the other parties. Leeper was directly involved in casing the businesses before they were robbed. In addition, Leeper would communicate with Quincy Louis via Bluetooth during the robberies as his lookout. Leeper also benefited from the proceeds of the robberies. Not only did she get her cut from each robbery, she was also staying in hotels and buying food and drugs from the proceeds.

The vast number of violent robberies and complete disregard for the people working in these businesses is inexcusable. The United States respectfully requests the court sentence the defendant to 93 months incarceration and a 3 year term of supervised release.

Dated this 1st day of May, 2024.

UNITED STATES OF AMERICA  
Plaintiff

SUSAN T. LEHR  
United States Attorney

By: *s/Kimberly C. Bunjer*  
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CERTIFICATE OF SERVICE

I hereby certify that on May 1, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the parties of record.

*s/Kimberly C. Bunjer*

**KIMBERLY C. BUNJER**

Assistant United States Attorney